



November 1, 2017

Thomas J. Navin

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG
Docket No. 17-59

Dear Ms. Dortch:

On October 30, 2017, Rich Fruchterman, Aaron Goldberger, and Doreen Kass of Neustar, Inc. (“Neustar”) and the undersigned of Wiley Rein LLP met with the following representatives of the Federal Communication Commission (the “Commission”): Zenji Nakazawa, Public Safety and Consumer Protection Legal Advisor to Chairman Pai; Claude Aiken, Wireline Legal Advisor to Commissioner Clyburn; Amy Bender, Wireline Legal Advisor to Commissioner O’Rielly; Travis Litman, Chief of Staff to Commissioner Rosenworcel; and Jamie Susskind, Chief of Staff to Commissioner Carr. The purpose of these meetings was to discuss the Commission’s Notice of Inquiry regarding robocalls to reassigned telephone numbers, particularly the question of whether the Commission should mandate the creation of a database of reassigned numbers.¹

Neustar supports the Commission’s commitment to tackling the multifaceted problems associated with autodialed and pre-recorded calls to reassigned phone numbers. Neustar reiterated, however, that the creation of a new database of reassigned phone numbers is not the solution. Rather, Neustar noted that there are many commercial offerings in the market today that provide telephone number disconnect information, including products offered by Neustar that also provide identity verification in addition to enhanced disconnect information.² Using these

¹ *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Second Notice of Inquiry, FCC 17-90 (“*Second Notice of Inquiry*”).

² Neustar noted that it currently has greater than 95% of true wireless disconnects in its data and can also verify name to phone linkages on approximately 90% of wireless subscribers. Neustar also expressed its belief, based on its experience in managing large data sets, that it would be difficult for any database to obtain 100%



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services, callers can remove from their autodialing lists any number that is suspected of no longer belonging to the consumer from whom the caller received consent. These products obviate the need for a federally-mandated database, which would take years to develop.

Finally, Neustar urged the Commission to adopt a safe harbor protecting entities that use commercially-available TCPA-compliance products that include wireless disconnect data. A safe harbor will encourage entities to use such products, improving consumer protection. Increased use of these products will also encourage the development of new, innovative solutions, which will help lower costs and further protect consumers and businesses. Finally, as these products are already available, they can be used immediately, whereas an FCC-mandated database will take time to develop and implement.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact me.

Very truly yours,

/s/ Thomas J. Navin

Thomas J. Navin

Counsel to Neustar, Inc.

cc: Claude Aiken
Amy Bender
Travis Litman
Zenji Nakazawa
Jamie Susskind

coverage. *See also* Letter from Richard L. Fruchterman, III, Neustar, to Marlene H. Dortch, FCC, CG Docket No. 17-59 (Oct. 16, 2017).